



TO: Senate Environment Finance Committee Members
FROM: Jesse McArdell, NMMA; Lee Gatts, WSIA; and Chad Tokowicz, MRAA
DATE: April 18, 2024
RE: Opposition to EPR Provisions

Dear Members of the MN Senate Environment Committee,

On behalf of the National Marine Manufacturers Association (NMMA), the Watersports Industry Association (WSIA), and the Marine Retailers Association of the Americas (MRAA), I am writing to express our opposition to several provisions in the 2024 supplemental budget bill.

By way of introduction, NMMA is the trade association for the U.S. recreational boating industry, representing 1,300 marine businesses, including recreational boat, marine engine, and accessory manufacturers. The recreational boating industry has a \$230 billion impact on the nation's economy, supporting over 800,000 American jobs across 35,000 U.S.-based marine businesses.

WSIA is the towed watersports industry's leading advocate, working to strengthen, grow boating and protect the interests of its member companies and recreational boaters across the country. The WSIA develops best practices, maintains waterway access rights, educates participants, and promotes safety on the water, including when participating in towed watersports. WSIA represents over 440 member companies, including boat, marine engine, and accessory manufacturers, as well as marine dealers.

MRAA is the leading trade association of North American small businesses that sell and service new and used recreational boats and operate marinas, boatyards, and accessory stores. MRAA represents more than 1,300 individual member retail locations and conducts advocacy efforts on their behalf. Minnesota's outdoor recreational community and industry are at serious risk if invasive carp continue to move upriver and spawn.

Thank you for your work in crafting this omnibus bill and for your consideration of important environmental investments. As you know, our state's natural resources are crucial to our economy and way of life, and we must do all we can to protect and preserve them.

Packaging Waste and cost Reduction Act

We commend the efforts reflected in the omnibus bill to promote recycling. However, we are concerned that certain aspects of the Packaging Waste and Cost Reduction Act may be overly restrictive. While we wholeheartedly support waste reduction and recycling initiatives, the proposed one-size-fits-all solution for packaging types with diverse recycling needs, as outlined in Senate File 3561, could impose undue financial burdens on Minnesota's small marine businesses.

Instead, we propose that the committee consider supporting incentives for businesses and the public to reduce landfill waste without artificially inflating manufacturing and consumer costs. Moreover, we urge the exploration of leveraging the existing Solid Waste Management Tax, which generates over \$100 million annually, to bolster and enhance the state's solid waste infrastructure. Additionally, expanding proven public education programs can foster greater participation in recycling efforts.

Lastly, any extended producer responsibility requirements should align with a coordinated national effort. Adhering to these principles will better facilitate the achievement of waste reduction goals without adversely impacting marine businesses.

Keep it Clean

We endorse the allocation of \$1,418,000 as proposed in the DE amendment to SF3887 for the Keep It Clean grants initiative. The proposal, authored by Rep. Andrew Myers and Sen. Aric Putnam, aims to institute a comprehensive statewide program. This program will provide grants to local governmental bodies and nongovernmental organizations to execute localized initiatives aimed at curbing water pollution.

Our full backing extends to the Keep It Clean Coalition and its endeavors to combat the escalating issue of waste and debris left behind by individuals during the ice fishing season. Our advocacy dates to 2023, when we lent our support to legislation aimed at establishing policies to maintain the cleanliness of our lakes during this period. Our endorsement of this year's legislation remains steadfast, as we firmly believe it will safeguard Minnesota's water bodies and aquatic habitats. Moreover, it stands to benefit those who partake in recreational activities on Minnesota's waters. We urge your support for the approval and subsequent enactment of the Keep It Clean grant program into law this year.

In conclusion, while we oppose certain aspects of the 2024 Environment Omnibus Bill, particularly the Packaging Waste and Cost Reduction Act, we wholeheartedly support the Keep it Clean Initiative. Our concerns primarily revolve around the potential impact of the EPR program on small marine businesses in Minnesota. However, we remain committed to constructive dialogue and hope to address our reservations through further refinement of the bill's language. Our aim is to contribute to legislation that not only protects our environment but also fosters economic and social well-being for all Minnesotans. Achieving this balance requires ongoing collaboration and dedication to finding common ground for a sustainable future.

Sincerely,

Jesse McArdell

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Chad Tokowicz

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Marine Retailers Association of the Americas